

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ILLINOIS UNION INSURANCE COMPANY as subrogee of CITY OF LAWRENCE)	CIVIL ACTION
)	
Plaintiff,)	NO.04-10475 MLW
)	
v.)	
)	
THE VIKING CORPORATION)	
)	JURY TRIAL DEMANDED
Defendant.)	

JOINT MOTION TO AMEND THE DISCOVERY CONFERENCE REPORT

Plaintiff Illinois Union Insurance Company (“Illinois Union”) and Defendant The Viking Corporation (“Viking”) have conferred and jointly move this Court to adopt and enter the *Second Amended Discovery Conference Report* submitted with this motion.

In support of this motion, the Parties state as follows:

1. Notwithstanding the best efforts of the Parties, initial discovery has continued to take longer than anticipated.
2. Thus, the Parties have conferred and agreed to amend all future discovery dates to ensure adequate time for each party to prepare and/or respond to all such deadlines and to prepare this matter for mediation and trial, if necessary.

WHEREFORE, Illinois Union and Viking respectfully request this Court to:

- (1) Enter an Order adopting and entering the *Second Amended Joint Discovery Report*;
and
- (2) Grant all other relief that this Court deems just and necessary.

Respectfully submitted,

Plaintiff Illinois Union Insurance Company
as subrogee of City of Lawrence,
By Its Attorneys,

/s/ James P. Cullen, Jr.

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Dated: July 26, 2005

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Respectfully submitted,

Defendant Viking Corporation
By Its Attorneys,

/s/ Gina M. McCreadie

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Dated: July 26, 2005

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2005, a true and correct copy of the foregoing *Joint Motion to Amend the Joint Discovery Report and Second Amended Discovery Conference Report* was served by first class mail on the following:

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